



Wisconsin Legislative Council

RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 22-027

Comments

[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Legislative Council Staff and the Legislative Reference Bureau, dated November 2020.]

4. Adequacy of References to Related Statutes, Rules and Forms

The related statute, s. 448.963, Stats., references initial certification in both s. 448.963 (2) (b) 2. and 3., Stats., using slightly different language (“[r]eceived initial certification” and “[b]een initially certified”, respectively). If it is the agency’s intent that s. OT 2.02 (1) (b) refers to evidence of either of these occurrences, it may be useful to provide a more specific description of the relationship between the code provision and the statutes in the agency’s analysis of the proposed rule.

5. Clarity, Grammar, Punctuation and Use of Plain Language

The agency should use consistent capitalization of “National Board for Certification in Occupational Therapy” throughout the proposed rule and the related administrative code chapter. As currently proposed, the entity’s name will be capitalized in s. OT 2.02 (1) (b), but not in ss. OT 2.02 (1) (c), (2), and (3), and 2.03 (1) of the existing code. [See s. 1.06 (2), Manual.]